

IN THE SUPREME COURT OF MISSISSIPPI**JEFFREY HAVARD****PETITIONER****v.****No. 2013-DR-01995-SCT****STATE OF MISSISSIPPI****RESPONDENT****PETITIONER'S MOTION FOR TIME**

COMES NOW the Petitioner, by and through counsel of record, and would respectfully request that this Honorable Court extend the time to file his Rebuttal to the State's Amended Response in Opposition to Petitioner's Amended Motion for Relief from Judgment or Leave to File Successive Petition for Post-Conviction Relief. In support of this Motion, Petitioner would show unto the Court the following:

1. On September 3, 2014, this Court entered its Order granting Petitioner's Motion to Amend and deeming the Amended Motion for Relief from judgment filed as of that day. Respondents were given 14 days within which to file its Response. Petitioner was given 7 days after the filing of the State's Response to submit a Rebuttal.

2. The State requested, with the agreement of Petitioner, an extension of time within which to respond to the Amended Motion for Relief. The State's extension was granted.

3. The State filed its Amended Response on September 26, 2014. The Amended Response totals 85 pages and raises numerous arguments.

4. Due to length of the Response, an upcoming out of state trip [from October 1 to October 6] for one of Petitioner's attorneys, and the need for counsel to meet and confer with Havard prior to filing the Rebuttal to the State's Amended Response, Petitioner seeks an extension until October 13, 2014 within which to file his Rebuttal to the State's Amended Response.

5. Undersigned counsel has conferred with counsel for the State, who indicated that the State does not object to the requested extension.

6. This request is not made for the purpose of unreasonable delay or harassment of any party or person.

WHEREFORE, premises considered, the Petitioner requests that the Court grant him an extension until October 13, 2014 within which to file his Rebuttal to the State's Amended Response to Petitioner's Amended Motion for Relief from Judgment.

Respectfully submitted, this the 29th day of September, 2014.

JEFFREY HAVARD, PETITIONER

/s/ Graham P. Carner
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ATTORNEYS FOR PETITIONER JEFFREY HAVARD

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing with the MEC filing system, which sent notice to the following:

Jim Hood
Jason L. Davis
Brad A. Smith
Office of the Attorney General

This the 29th day of September, 2014.

/s/ Graham P. Carner
GRAHAM P. CARNER